

REMARKS

This is in response to the November 18, 2005 Final Office Action. Claims 1-10, 19-28 and 30-38 are pending. No amendments to the claims are proposed herein. Reconsideration is respectfully requested.

Claim Rejections – 35 U.S.C. §103

On page 2, item 3 of the November 18, 2005 Final Office Action, claims 1-10, 19-28, 30, 33 and 37 were rejected under 35 U.S.C. §103(a) as obvious over the new reference Ghahremani et al. (U.S. Patent Publication No. 2005-0180429) in view of the previously applied reference Coley et al. (U.S. Patent Publication No. 2001-0011253).

Neither Ghahremani et al. nor Coley et al. disclose or suggest a “feature rights management agent operatively coupled to the feature rights server to receive feature keys from the feature rights server, to store feature rights in a repository, and to identify available feature units provided” as recited in for example in claim 1. Ghahremani et al. disclose the general architecture of a chassis used for call setup and release of channels for telephone calls. (See for example pp. 8-9 the memory management in relation to call connection and termination). Call setup and release of channels for telephone calls do not disclose or suggest the claimed dynamic management of feature rights. We claim a novel feature rights management agent, between the feature key server and an application card, which receives “feature keys from the feature rights server” (claim 1) and allocates them to individual application cards. Our claimed system manager card and feature rights management agent manages features, and that of Ghahremani et al. and Coley et al. do not. Ghahremani et al. manage calls and channels, not features allocated to an application card. Furthermore, Coley et al. assign software applications, not features. Coley et al. disclose check-in and check-out of software applications, not telecommunications features. Coley et al. assign these software applications among general purpose desktop PCs over a LAN, not application cards in a chassis over a common backplane bus. Neither reference alone or in combination suggests the dynamic management of feature rights as claimed.

These references also would not have been combined at the time of the inventions. One of ordinary skill would not have been lead to assign feature rights in an agent of a chassis such Ghahremani et al. given the assignment of software applications among general purpose desktop PCs over a LAN of Coley et al. The present inventions allow an application card to be swapped out of the chassis for a new application card. Features (specifically telecommunications features in new dependent claims 30, 33 and 37 such as a prepaid billing feature) can then be reallocated to the new application card. Assigning software applications among general purpose desktop PCs over a LAN or setup of telephone calls does not teach the notion of managing features using the claimed “feature rights management agent operatively coupled to the feature rights server”.

Dependent claims 2-10, 20-28 and 30, 33 and 37 contain the limitations of their corresponding independent claims 1 or 19 and are patentable over Ghahremani et al. and Coley et al. for the reasons discussed above. Furthermore, dependent claims 2-10, 20-28 and 30, 33 and 37 contain additional limitations which are not taught or suggested by Ghahremani et al. and Coley et al. For example, claims 30, 33 and 37 recite that the features are telecommunications features. Coley et al., on the other hand, disclose check-in and check-out of software applications, not telecommunications features. And Ghahremani et al., as discussed above, disclose the setup of calls, not telecommunications features. Furthermore by the doctrine of claim differentiation the definition of the term “telecommunications features” contains the prepaid billing feature of Claims 34 and 38. Claims 8 and 26 also recite that each feature key comprises a plurality of feature rights including a) feature units, b) a feature category, and c) a distribution node identifier. Ghahremani et al. and Coley et al. do not disclose or suggest at least feature categories or distribution node identifiers by the check-in and check-out of software applications.

Accordingly, reconsideration and withdrawal of the rejection of claims 1-10, 19-28, 30, 33 and 37 under 35 U.S.C. §103(a) over Ghahremani et al. in view of Coley et al. is respectfully requested.

On page 8, item 16 of the November 18, 2005 Final Office Action, new claims 31, 35, 32 and 36 were rejected under 35 U.S.C. §103(a) as obvious over the new reference Ghahremani et al. (U.S. Patent Publication No. 2005-0180429) and the previously applied reference Coley et al.

(U.S. Patent Publication No. 2001-0011253) further in view of the new reference Summers et al. (U.S. Patent No. 6,098,133).

Summers et al. do not disclose or suggest, alone or in combination, that “the common backplane bus of the chassis is a trusted bus” (claims 31 and 32) or that “the common backplane bus of the chassis connects the plurality of application cards to the system manager card over a trusted intra-card bus” (claims 35 and 36). In the present inventions the common backplane bus is trusted because it is on the chassis that the two cards (system manager and the individual application blade) reside.

Accordingly, reconsideration and withdrawal of the rejection of claims 31, 35, 32 and 36 under 35 U.S.C. §103(a) over Ghahremani et al. in view of Coley et al. and Summers et al. is respectfully requested.

On page 9, item 19 of the November 18, 2005 Final Office Action, new claims 34 and 38 were rejected under 35 U.S.C. §103(a) as obvious over the new reference Ghahremani et al. (U.S. Patent Publication No. 2005-0180429) and the previously applied reference Coley et al. (U.S. Patent Publication No. 2001-0011253) further in view of the new reference Salkini et al. (U.S. Patent No. 6,912,230).

New claims 34 and 38 recite exemplary features such as prepaid billing. Given these three references, it would not have been obvious to receive “feature keys from a feature rights server” such as those for a prepaid billing capability and allocate them to individual application cards. None of the references disclose a feature rights server to storing telecommunications features such as the prepaid billing feature of claims 34 and 38.

Accordingly, reconsideration and withdrawal of the rejection of claims 31, 35, 32 and 36 under 35 U.S.C. §103(a) over Ghahremani et al. in view of Coley et al. and Salkini et al. is respectfully requested.

Conclusion

All the issues in the Office Action dated November 18, 2005 have been addressed. Favorable consideration of the present application is requested. If any issues remain, the Examiner is invited to call the undersigned.

The Examiner is invited to contact the Applicants' Representative at the below-listed telephone number if there are any questions regarding this communication.

Respectfully submitted,

William V Vroman et al.

By their Representatives,

By



Daniel W. Juffernbruch
Reg. No. 33,122
847-458-6313

Patents and Licensing LLC
28 Barrington Bourne
Barrington, IL 60010-9605
tel: 847-458-6313
fax: 815-301-8408
Dan@patentsandlicensing.com

CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on February 21, 2006.
